



State of New Hampshire  
DEPARTMENT OF ENVIRONMENTAL SERVICES

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095  
(603) 271-2900 FAX (603) 271-2456



October 2, 2002

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

**NOTICE OF PAST VIOLATION**

Mr. James Grady  
Director, Sales and Marketing  
Harcros Chemicals, Inc.  
8 Capitol Street  
Nashua, NH 03060

**RE: Harcros Chemicals Inc., Nashua, New Hampshire  
EPA ID No. NHD 000791731**

Dear Mr. Grady:

On March 7, 2002, the Department of Environmental Services (DES) conducted an inspection of Harcros Chemicals, Inc. (Harcros). The purpose of the inspection was to determine Harcros's compliance status with RSA 147-A and its implementing regulations, the New Hampshire Hazardous Waste Rules (codified as Env-Wm 100-1100).

As a result of the inspection and review of the information provided to DES, the following deficiencies were documented:

**1. Env-Wm 510.02(d,f) - Manifest Distribution**

At the time of the inspection, Harcros had not ensured submittal of Copy 2 for manifests MAQ 026220 and MAQ 026221, and Copy 7 for manifest MAM 922774

Env-Wm 510.02 (d,f) requires that the generator retain one (1) copy of the manifest, give five (5) copies to the transporter, and forward one (1) copy to the destination state and one (1) copy to DES within five (5) days of shipment.

DES requests that Harcros properly distribute the hazardous waste manifests.

*Note: DES acknowledges receipt of copies of all three (3) manifests during or shortly after the inspection, and requests that Harcros properly retain and distribute manifest copies for future shipments of hazardous waste.*

**2. Env-Wm 807.06 (b)(4) - Standards for Generators of Used Oil Being Recycled**

At the time of the inspection, one (1) 55-gallon container in the Waste Oil Area was not marked with the words "Used Oil for Recycle".

As a service to New Hampshire's hazardous waste generators, we maintain a Hazardous Waste Assistance Hotline, which is available for you to contact our knowledgeable staff of hazardous waste inspectors. Our hazardous waste staff are available to answer your questions concerning the New Hampshire Hazardous Waste Rules and the compliance issues which affect your hazardous waste management program. The technical assistance available through the Hotline includes fact sheets that pertain to the management and recycling of specific wastes, summary sheets on specific sections of the Hazardous Waste Rules, copies of EPA and New Hampshire hazardous waste policy or regulatory interpretation letters that may benefit your operation, and networks with other state or federal agencies to answer your questions on a national level. The hotline is available Monday through Friday, 8:00 AM to 4:00 PM at 271-2942.

If you believe that the deficiencies documented in this NOPV have been cited in error, or if you have any questions regarding this matter, please contact the lead inspector, Nancy Phillips, Waste Management Specialist, or John J. Duclos, Supervisor of the Hazardous Waste Compliance Section, at 271-2942. Specific questions regarding water related issues may be directed to Sharon Ducharme of DES's Water Division at 271-3307, and for air related issues, please contact Pam Monroe of DES's Air Resources Division at 271-1370. Thank you for your cooperation.

Sincerely,



Kenneth W. Marschner, Administrator  
Waste Management Programs  
Waste Management Division

CERTIFIED MAIL RRR# 7099 3400 0002 9773 1519  
cc: DB/RCRA/NOPV/Archive  
Philip J. O'Brien, Ph.D., Director, WMD  
Gretchen Rule, DES Administrator, Legal Unit

E mail: JJD, SD/WD, PM/ARD, SD/CO

Enclosure:

- 1) Container Inventory
- 2) Hazardous Waste Generator RCRA Inspection Checklist